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6 Attorney for Alexander Kostan
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 ALEXANDER KOSTAN,
15

Defendant.
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Case No. 2:21-cr-00081-APG-DJA

**STIPULATION TO CONTINUE
PROBATION REVOCATION
HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Mina Chang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,
20 Assistant Federal Public Defender, counsel for Alexander Kostan, that the Probation
21 Revocation Hearing currently scheduled on May 29, 2024, be vacated and continued to a date
22 and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. Since filing the last stipulation to continue, defense counsel has met with
25 Defendant in person, received numerous records documenting her health issues and assault, and
26 worked with her to resume her counseling sessions at the Community Counseling Center.

2. Defendant has continued to experience health problems that have delayed further completion of probation requirements. Defense counsel is working to obtain records documenting these health problems.

3. In addition, defense counsel will be in a six-week trial (*United States v. Dallmann*, Case No. 2:22-cr-00030-RFB-DJA (D. Nev.)) during the time set for the revocation hearing in this matter. The trial begins May 28, 2024, and is scheduled to proceed until July 5, 2024. Defense counsel will be unable to devote significant attention to this matter during that time period.

4. The parties agree that additional time is warranted to allow Defendant to come into compliance and to permit defense counsel to prepare for and participate in trial in another matter.

5. Defendant is out of custody and agrees with the need for the continuance.

6. The parties agree to the continuance.

This is the second request for a continuance of the probation revocation hearing.

DATED this 21st day of May, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Rick Mula
RICK MULA
Assistant Federal Public Defender

By /s/ Mina Chang
MINA CHANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 ALEXANDER KOSTAN,

7 Defendant.
8

Case No. 2:21-cr-00081-APG-DJA

ORDER

9
10 IT IS THEREFORE ORDERED that the probation revocation hearing
11 currently scheduled for May 29, 2024 at 1:30 p.m., be vacated and continued to July 30,
12 2024 at the hour of 1:30 p.m. in courtroom 6C; or to a time and date convenient to the court.

13 DATED this 22nd day of May, 2024.

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16 UNITED STATES DISTRICT JUDGE
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